

MONICA DANIEL HUTCHISON,)
)
Plaintiff,)
)
vs.) Case No. 09-3018-CV-S-RED
)
TEXAS COUNTY, MISSOURI; MICHAEL)
R. ANDERSON, TEXAS COUNTY)
PROSECUTING ATTORNEY; and)
MICHAEL R. ANDERSON,)
Individually,)
) April 5, 2010
Defendants.) Houston, Missouri

a Witness, produced, sworn and examined on the 5th day of April, 2010, between the hours of 8 a.m. and 5 p.m. of that day, at Texas County Courthouse, 210 North Grand, City of Houston, County of Texas, before

in the above-entitled cause, pursuant to Notice to Take
Video Deposition, on the part of the Plaintiff.

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1 okay, where did it say in that that there was
2 something that happened at the lake? Which one of
3 those exhibits had that on it?
4 MR. HARRIS: Are you talking about the
5 damage complaint?
6 THE WITNESS: Yeah.
7 MR. HARRIS: Are you talking about
8 that right there?
9 THE WITNESS: Yeah.
10 BY MR. STEELMAN:
11 A. "Inappropriate behavior during the
12 prosecutor's training seminar in September of 2005."
13 When we came back from that, the incident was, Monica
14 and I and Christie and Mike were sitting at one of
15 the lake bar lounges. We were having a drink.
16 Monica and I got up to dance. Some guy
17 came over and introduced himself. Mike was up
18 getting a drink. Some guy walked over and introduced
19 himself and shook all of our hands. When Mike walked
20 up, he shook Mike's hand.
21 Shortly after that, we got up and left to
22 go to the room. Monica was mad. And I said, "Guys,
23 I've got to go and call my husband and my daughter."
24 So I went toward the lodge room and they were walking
25 down the sidewalk, and all I know is that they got

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1 very loud.
2 I don't know what was said. I didn't hear
3 what was said. But when we got back to the office,
4 all of a sudden it was my fault. What happened at
5 the lake was my fault because --
6 Q. Who said that?
7 A. Monica to Mike.
8 Q. Well, how do you know Monica said that to
9 Mike?
10 A. Mike and Christie told me.
11 Q. Okay, okay, that's all I wanted to know.
12 Go ahead.
13 A. So Christie went to bat for me and she went
14 in there and told her what happened at the lake and
15 that Monica just wanted me out of there and she
16 wanted to blame it all on me, because she still
17 wanted to be the perfect little Monica in Mike's
18 eyes.
19 Q. And who told you this?
20 A. I believe that.
21 Q. Why?
22 A. Why? Because Monica told us constantly she
23 was the boss. She told Mike what to do. She hired
24 us; she could fire us.
25 Q. Now, had you talked this over with Mike

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1 Anderson about Monica saying that?
2 A. Yeah.
3 Q. When did you last talk to Mike about that?
4 A. I have no idea.
5 Q. Just an idea?
6 A. When it was all going on. When the EEOC
7 people came, you know, we all talked about it. You
8 can't go home and talk about it. You've got to talk
9 to the people there that are involved.
10 Q. What has Mike Anderson said to you in the
11 last year about the lawsuit?
12 A. That he would let me know when we would
13 have to go to court or something.
14 Q. Anything else?
15 A. No.
16 Q. So the only conversation, other than him
17 letting you know when you go to court, was when you
18 told Mike Anderson about the sex with you and your
19 husband?
20 A. That was the last time I spoke to Mike, I
21 think, yeah. I mean, I've see him since then.
22 Q. My question is, what is the conversation
23 regarding the lawsuit? Has it been -- other than
24 your comments to him, has it been just that he was
25 going to tell you when you had to show up, etc.?

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1 A. Yeah, stuff like that. If I needed
2 anything, if I had questions, I could call him.
3 Q. And did you have any questions? Have you
4 called him?
5 A. The only question I've ever asked him is,
6 "How's it going?" Do we know what's going on?" "Is
7 it over?"
8 Q. And what did he say?
9 A. No, it's not over. It's still going on.
10 Q. So do I understand that all the information
11 that you've given me today actually was information
12 that you knew of prior to your affidavit of May 12,
13 2006; is that right?
14 A. Uh-huh. Monica tried to use me as the gate
15 -- what am I saying -- she tried to use me as the way
16 to smooth over what happened at the lake, the
17 incident that they said he -- was inappropriate
18 behavior.
19 Q. But your affidavit says you were -- she
20 alleged that you were the person who told him about
21 her plans against him and her offensive behavior
22 around the office. So my question --
23 A. Uh-huh, she thought I was the one.
24 Q. What leads you to believe that she thought
25 you told him about the offensive behavior around the